

Message

From: Hanson, Robyn [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=C4CD36EF688F47ABA2373A33B5D9B8FF-HANSON, ROB]
Sent: 4/1/2021 11:39:58 PM
To: Cathy Laughner [cathyl@bkbh.com]
CC: Thomas Jodoin [TJODOIN@helenamt.gov]
Subject: RE: City of Helena paragraphs 112, 113
Attachments: Helena revised para 112_EPA revisions returned to City 4-1-21.docx; Helena revised para 113_EPA revisions returned to City 4-1-21.docx

Cathy,

Thank you for the redlines you proposed for paragraphs 112 and 113. We have made additional redlines for the City's consideration.

Regarding our redlines on Paragraph 112, we recognize that this paragraph could warrant additional updates to the introductory sentences depending on the City's response to our recent email regarding our initial review of your March 30, 2021, local limits submittal.

Robyn

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From: Cathy Laughner <cathyl@bkbh.com>
Sent: Monday, March 15, 2021 5:16 PM
To: Hanson, Robyn <Hanson.Robyn@epa.gov>
Cc: Thomas Jodoin <TJODOIN@helenamt.gov>
Subject: City of Helena paragraphs 112, 113

Robyn,

Thank you for your responses to my questions and our 3/12 discussion regarding paragraphs 112 and 113. I have studied the regulations, and believe the attached revised paragraphs are consistent with the regulations. The City does not know what "approvable form" is in paragraph 113, so would have a hard time satisfying that condition.

I appreciate your willingness to consider a redline of these paragraphs. If you do not agree that this language would work, and if there has been some adjudication interpreting the applicable regulations, please point me in the right direction to this authority.

Thank you.
Cathy Laughner